

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MORRIS FIDDLER, individually and)
on behalf of a class of similarly)
situated individuals,)
)
Plaintiff,)
)
v.)
)
AT&T MOBILITY LLC, d/b/a The)
New AT&T f/k/a CINGULAR)
WIRELESS, a Delaware limited)
liability company, M-QUBE, INC., a)
Delaware corporation, and)
VERISIGN, INC., a Delaware)
corporation,)
)
Defendants.)
)
Case No. 08C416
Judge Der-Yeghiayan

PARTIES' JOINT MOTION TO STAY ALL PROCEEDINGS AND OBLIGATIONS

The parties to this action, defendants AT&T Mobility LLC, M-Qube, Inc. and Verisign, Inc. and plaintiff Morris Fiddler, jointly and respectfully move this Court to stay all proceedings and obligations in this action for sixty (60) days. In support of this motion, the parties state as follows:

1. This action was filed on December 17, 2007 in the Circuit Court of Cook County. The action was removed to this Court on January 18, 2008. Plaintiff has filed a petition to remand the case, which is fully briefed. Absent further extensions, Defendants' responses to the complaint are due on Friday, March 7, 2008.

2. The parties have recently begun to explore a possible settlement of this action. In order to focus their efforts more fully on the exploration of settlement, the parties jointly request that the Court stay all proceedings and obligations in this action for sixty (60) days.

3. There is a status hearing currently set for March 11, 2008 at 9:00 a.m. The parties request that the court reset the status to a date on or about May 13, 2008 so that the parties may report to the Court on the status of settlement discussions.

WHEREFORE, the parties respectfully request that the Court grant their joint motion to stay all obligations and proceedings in the action and that the Court reschedule the March 11, 2008 status to a date on or about May 13, 2008.

Dated: March 3, 2008

Respectfully submitted,

AT&T MOBILITY LLC

By: /s/ Victoria Collado
One of its Attorneys

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By: /s Myles McGuire(with consent)
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CERTIFICATE OF SERVICE

I, Sarah E. Reynolds, an attorney, hereby certify that a true and correct copy of **PARTIES' JOINT MOTION TO STAY ALL PROCEEDINGS AND OBLIGATIONS PENDING SETTLEMENT NEGOTIATIONS** was served on the following counsel of record via electronic delivery on March 3, 2008:

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Respectfully submitted,

/s/Sarah E. Reynolds

Dated: March 3, 2008

Attorney for Defendant AT&T Mobility LLC